

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA )  
AND THE STATE OF CALIFORNIA, )  
*EX REL. STEVEN HIGGINS* ) Civil Action No. 11-cv-02453-JNE-SER  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
BOSTON SCIENTIFIC )  
CORPORATION )  
 )  
Defendant. )  
 )

**RELATOR'S MOTION TO COMPEL**

Pursuant to Federal Rules of Civil Procedure 37(a) and Local Rule 37.1, Relator moves to compel Defendant Boston Scientific Corporation to amend the privilege log it produced to Relator on January 3<sup>rd</sup>, 2019 and amended on January 15<sup>th</sup>, 2019, or, in the alternative, to produce all the documents with inadequate privilege entries in that privilege log, as described in the contemporaneously-filed Memorandum of Law. The motion is based upon the pleadings, all of the files, records, and proceedings in this case, and Relator's Memorandum of Law.

Dated: July 2, 2019

Respectfully submitted,

**BERGER & MONTAGE, P.C.**

By: /s/ Daniel R. Miller  
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**CERTIFICATE OF SERVICE**

I certify that on July 2, 2019, I caused the foregoing document to be filed via the Court's CM/ECF electronic filing system, which will provide an electronic copy to all counsel of record.

By: /s/ Daniel R. Miller